

Patrick M. Lynch, Esq.  
State Bar Number 24065655  
QUILLING, SELANDER, LOWNDS, WINSLETT & MOSER, P.C.  
2001 Bryan Street, Suite 1800  
Dallas, TX 75201  
(214) 871-2100 (telephone)  
(214) 871-2111 (telefax)  
Email: [plynch@qslwm.com](mailto:plynch@qslwm.com)

Attorneys for Line 5, LLC d/b/a Texas Line 5, LLC

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

IN RE:

Ryan Nicholas Weiss, § Case No. 21-31701-hdh11

Debtor. §

---

Line 5, LLC d/b/a Texas Line 5, LLC, §

Movant, §

v. §

Ryan Nicholas Weiss, §

Debtor-Respondent. §

**MOTION TO EXTEND DEADLINE FOR FILING  
COMPLAINTS UNDER 11 U.S.C. §§ 523 & 727**

**21-DAY NEGATIVE NOTICE – LBR 9007-1(a):**

**NO HEARING WILL BE CONDUCTED HEREON UNLESS A  
WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE  
UNITED STATES BANKRUPTCY COURT BEFORE CLOSE OF**

**BUSINESS ON JANUARY 10, 2022, WHICH IS AT LEAST 21 DAYS FROM THE DATE OF SERVICE HEREOF.**

**ANY RESPONSE SHALL BE IN WRITING AND FILED WITH THE CLERK, AND A COPY SHALL BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED A HEARING MAY BE HELD WITH NOTICE ONLY TO THE OBJECTING PARTY.**

**IF NO HEARING ON SUCH NOTICE OR MOTION IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN.**

NOW COMES Line 5, LLC d/b/a Texas Line 5, LLC ("Line 5") and files this, his Motion to Extend Deadline for Filing Complaints Under 11 U.S.C. §§ 523 & 727 (the "Motion") as follows:

1. Ryan Nicholas Weiss (the "Debtor") filed a petition under Chapter 11 of the Bankruptcy Code on September 23, 2021. The first meeting of creditors was held on August 20, 2018. The bar date for parties to file a complaint to object to the Debtor's discharge or to challenge dischargeability of certain debts is December 21, 2021.

2. Pursuant to Federal Bankruptcy Rule 4004 and 4007, the time for filing a complaint to object to the Debtor's discharge or challenge the dischargeability of certain debts may, on motion of a party in interest, after hearing on notice, extend the deadline for filing such a complaint for cause.

3. Line 5 has filed, or will soon file, a motion to take a 2004 examination of the Debtor to determine whether a factual and legal basis exists to file an objection to discharge or discharge of its debt. The 2004 Motion will also contain a request for the Debtor to produce documents in connection with the examination. Movant notified counsel for the Debtor on December 13, 2021 of Line 5's intent to take a 2004 examination of the Debtor and inquired as to whether the Debtor will

appear by consent. The parties have tentatively agreed to hold the 2004 examination on January 4, 2022.

4. In addition to the information Line 5 hopes to elucidate through the 2004 Examination of the Debtor, Line 5 is having issues procuring information and documents from third parties with which both Line 5 and Debtor have an existing business relationship and which may require a subpoena to secure.

5. Line 5 requests that the bar date to file a complaint to object to the Debtor's discharge under §727 or to challenge dischargeability of certain debts under §523 be extended for a period of 30 days from December 21, 2021 to January 20, 2022.

6. This request is not made for delay, but rather to allow Line 5 and creditors sufficient time to determine whether a basis exists to bring such an action and file such pleadings in conformity with the high standard demanded by the Federal Rules of Civil Procedure.

**WHEREFORE, PREMISES CONSIDERED** Lucian Line 5 prays that this Court grant the requested relief and enter its order extending the bar date for parties to file a complaint to object to the Debtor's discharge under §727 or to challenge the dischargeability of certain debts under §523 for a period of 60 days from December 21, 2021 to January 20, 2022 and for such other relief to which it may be entitled.

Respectfully submitted,

QUILLING, SELANDER, LOWNDS,  
WINSLETT & MOSER, P.C.  
2001 Bryan Street, Suite 1800  
Dallas, Texas 75201  
(214) 871-2100 (Telephone)  
(214) 871-2111 (Facsimile)

By: /s/ Patrick M. Lynch  
Patrick M. Lynch  
State Bar No. 24065655

ATTORNEYS FOR  
LINE 5, LLC d/b/a TEXAS LINE 5, LLC

**CERTIFICATE OF CONFERENCE**

The below counsel hereby certifies that on December 17, 2021, he emailed Areya Holder regarding extending the bar date for objecting to the Debtor's discharge or the dischargeability of a debt and inquired if the Debtor would consent to the request, and Debtor's counsel indicated they are not opposed to the Motion presented provided the extension is limited to the movant, Line 5, LLC d/b/a Texas Line 5, LLC.

/s/ Patrick M. Lynch  
Patrick M. Lynch

CERTIFICATE OF SERVICE

A true and correct copy of the above captioned motion was served upon the parties listed below by electronic filing notification, on December 20, 2021.

U.S. Trustee  
1100 Commerce Street, Room 976  
Dallas, TX 75242

Areya Holder, Esq.  
Holder Law  
901 Main Street, Suite 5320  
Dallas, TX 75202

Scott M Seidel (SBRA V)  
Seidel Law Firm  
6505 West Park Blvd., Suite 306  
Plano, TX 75093

/s/ Patrick M. Lynch  
Patrick M. Lynch